

# Exhibit E



For thirty years, Gilardi has been the nation's leading expert in legal settlements and claims administration. Established by Dennis and Susan Gilardi in 1984, we are solely dedicated to ensuring that the principles of due process and the needs of clients and claimants are served. We have **administered more than 4,000 matters** and **distributed over \$25 billion in assets**, including the administration of the largest and most complex private settlement in history: *Enron Securities Litigation*. In all instances, we have had only one goal in mind – to earn your trust and become your primary partner.

### **We offer a full suite of services. We also offer a better way.**

As experts in all phases of legal administration, we pride ourselves on our unmatched transparency, service and expertise. Our services include:

<b>Pre-Settlement Consultation</b>	<b>Data Analysis &amp; Validation</b>	<b>Class Member &amp; Counsel Support</b>
<b>Website Development</b>	<b>Claims Processing</b>	<b>Legal Notification</b>
<b>Call Center</b>	<b>Disbursement</b>	<b>Tax Analysis &amp; Reporting</b>

### **Our methods are tested and our track record is proven.**

Through our history, we have served nearly all of the prominent firms in the United States and Canada, and have overseen settlements ranging **from less than 1 million dollars to more than 7 billion dollars**. We have also partnered with and performed administration services for numerous government entities, including:

- The U.S. Department Of Justice
- The Federal Trade Commission
- The U.S. Securities and Exchange Commission
- The U.S. Commodity Futures Trading Commission
- The Attorneys' General of every state and various local and county entities

Indeed, our commitment to our people, our market, and our investment in technology driven solutions was recognized when readers of *The Recorder* voted us as the **Best Claims Administrator** in both 2012 and 2013.



## **The Gilardi Difference**

***We understand the case.*** Our management reflects an experienced, interdisciplinary team of professionals and our operational managers have an average tenure of more than a decade's worth of claims administration specific experience.

***We sweat the details.*** Our processes rely on exhaustive and precise planning, a goal-driven plan and measured and transparent results. We do much of our best work well before the claims process begins.

***We are Independent.*** Our market demands that we have no conflicts of interest that could compromise our services or undermine the basic ethical principles of the legal system. Because of our closely held nature and our commitment to ethical principles and corporate governance, Gilardi has never had a conflict of interest, however remote, in any matter.

***We are Leaders in Technology.*** Our commitment to technological solutions and ongoing investment in technology accelerates the cost efficiency and accuracy of our work, allowing us to exert tight operational controls, while processing work onsite at our central facility.

***We never outsource. Ever.*** Our work is direct and confined. We exercise local control in all matters and do not offshore any portion of our administration work.

***We are here to serve.*** At the end of the day, we understand that each and every settlement is personal: personal to the lawyers who have litigated the matter, personal to the claimants who participate in the claims process and personal to the court responsible for oversight. We are committed to ensuring that our service also remains a personal one.

## Antitrust

*Law, Hall, Schreiber, et al. v. The National Collegiate Athletic Association* (Nos. 94-cv-02053, 94-cv-02392, and 95-cv-02026) (D. Kan.) (\$54.5 million settlement)

Compensation limits for certain Division I coaches.

*In re Rubber Chemicals Antitrust Litigation* (Settlement funds totaling \$319.5 million)

Copper Products Antitrust Cases (\$83.5 million combined settlement)

*In re Polychloroprene Rubber Antitrust Litigation* (Settlement funds totaling \$55.35 million)

*In re Static Random Access Memory (SRAM) Antitrust Litigation* (\$39.5 million indirect purchaser settlement; \$41 million direct purchaser settlement)

*In re New Motor Vehicles Canadian Export Antitrust Litigation* (\$35 million settlement)

Full administration services included online claims filing with VIN verification as well as tracking both consumer and fleet claims in multiple states.

*In re Ethylene Propylene Diene Monomer (EPDM) Antitrust Litigation* (\$105.8 million in settlements with multiple defendants)

*In re Synthroid Marketing Litigation* (\$98 million settlement)

*In re McKesson Governmental Entities Average Wholesale Price Litigation* (\$82 million settlement)

*In re Cathode Ray Tube (CRT) Antitrust Litigation* (Direct Purchaser class) (\$93 million in settlements between the Direct Purchaser Plaintiffs and Defendants CPT (\$10 million), Philips (\$27 million), Panasonic (\$17.5 million), LG (\$25 million), and Toshiba (\$13.5 million); litigation continues as to remaining Defendants)

*Pecover v. Electronic Arts, Inc.* (\$27 million settlement)

Exclusive licensing agreements that allegedly raised the price on certain Electronic Arts video games.

*In re Titanium Dioxide Antitrust Litigation* (Direct Purchaser class) (\$163.5 million in settlements between the Direct Purchaser Plaintiffs and Defendants DuPont (\$72 million), Huntsman (\$6.5 million), Cristal (\$50 million), and Kronos (\$35 million))

*In re Optical Disk Drive Products Antitrust Litigation* (Direct Purchaser class) (\$26 million in settlements thus far; litigation continues as to remaining Defendants)

*In re Hydrogen Peroxide Antitrust Litigation* (Indirect Purchaser class) (\$4.2 million in settlements between the Indirect Purchaser Plaintiffs and Defendants Solvay (\$2.1 million), Degussa (\$950,000), Akzo (\$675,000), FMC (\$250,000), Kemira (\$225,000), and Arkema)

*Stetson v. West Publishing Corp.* (\$9.5 million settlement)

*Abid v. Grosvenor Bus Lines* (\$3.1 million settlement)

## Consumer Protection and Product Liability

*In re Toyota Motor Corp. Unintended Acceleration Marketing, Sales Practices, and Products Liability Litigation* (\$1.6 billion settlement) More than 22 million notices mailed.

*In re Mattel, Inc., Toy Lead Paint Products Liability Litigation*

Gilardi received, tracked, and stored returned product and distributed appropriate refunds pursuant to a complex settlement benefits matrix.

*Pappas v. Naked Juice Co.* (\$9 million settlement)

Over 700,000 claims generated without direct notice to the class

*Lavender v. Skilled Healthcare Group, Inc.* (\$50 million settlement)

*Utility Consumers' Action Network and Eric Taylor v. Sprint Solutions, Inc.* (\$2.2 million settlement)

*In re Bank of America Credit Protection Marketing and Sales Practices Litigation* (\$20 million settlement)

*In re Aurora Dairy Corp. Organic Milk Marketing and Sales Practices Litigation* (\$7.5 million settlement)

“American Idol”/“Deal or No Deal” Litigation – *Couch v. Telescope Inc./Herbert v. Endemol USA, Inc.* (\$51 million combined settlement)

*Stephens v. American Equity Investment Life Insurance Company* (\$36 million settlement)

*In re Bayer Corp. Combination Aspirin Products Marketing and Sales Practices Litigation* (\$15 million settlement)

*McCardle v. 24 Hour Fitness USA, Inc.*

Claimants were given access to all 24 Hour clubs regardless of current club access level.

*Clark v. AdvanceMe, Inc.* (\$11.5 million settlement)

*CLRB Hanson Industries, LLC v. Google, Inc.* (\$20 million settlement)

*White v. Celco Partnership d/b/a Verizon Wireless* (\$21 million settlement)

*Arce v. Kaiser Foundation Health Plan, Inc.* (\$9.29 million settlement)

*Budgin v. American Honda Motor Company, Inc.*

Honda reimbursed claimants for cost of replacing defective windshields.

*Daniel v. American Honda Motor Company, Inc.*

Honda reimbursed claimants for cost of replacing defective windshields.

*Bacca v. BMW of North America*

BMW reimbursed claimants for cost of sub-frame inspection and repair.

*Skuro v. BMW of North America/ATX*

Non-Reversionary Fund of \$300,000 for Claimants who declined or did not have option of Service Benefit.

*Shin v. BMW of North America*

BMW replaced defective wheels or reimbursed Claimants for cost of replacement.

*Chandran v. BMW of North America*

BMW replaced defective tires at a discount rate and reimbursed Claimants for past replacements.

*Abat v. Chase Bank USA* (\$4.9 million settlement)

## Federal Trade Commission Consumer Redress

**Gilardi has been an FTC contract holder for more than 25 years, and our contract was recently renewed for another term.**

*FTC v. Countrywide Home Loans, Inc.* (\$108 million redress)

More than 600,000 checks mailed. Gilardi reconciled the data, calculated distribution amounts, and mailed the first check distribution within 7 weeks of receiving the initial data.

*U.S. v. Select Portfolio Servicing, Inc.* (formerly Fairbanks Capital Holding Corp.) (\$40 million redress)

*FTC v. Associates First Capital Corp.* (Citigroup) (\$240 million redress)

*FTC v. EMC Mortgage Co. and The Bear Stearns Companies* (\$28 million redress)

*FTC v. Ameridebt* (\$14.8 million redress)

## Insurance

*Ruiz v. California State Automobile Association Inter-Insurance Bureau* (\$6.5 million settlement)

Distribution of Notice to almost 2 million potential class members who paid finance charges to Defendant when they paid their auto/homeowners insurance premiums in installments.

*L.A. Airline, Inc. v. Republic Indemnity Company of California* (\$1.85 million settlement)

Alleged artificially inflated workers' compensation premiums.

*Patrick v. California Physicians' Service dba Blue Shield of California* (\$20 million settlement)

Blue Shield of California subscribers alleged Defendants misrepresented how copayments and deductibles would be calculated.

Toyota Motor Credit Corporation Collateral Protection Insurance Litigation – *Bassett v. Toyota Motor Credit Corporation/Ganal v. Toyota Motor Credit Corporation* (Approx. \$18 million settlement)

Force-placed collateral protection insurance – motor vehicles.

*Coates v. Fidelity Acceptance Corporation* (\$11 million settlement)

Force-placed collateral protection insurance – motor vehicles.

*Farber v. Idaho State Insurance Fund* (\$2.95 million settlement)

Workers' compensation insurance dividend distribution improperly excluded holders of certain policies.

## Labor and Employment

*Saipan Garment Workers Litigation* (\$20 million settlement)

Litigation comprised of cases *Does I v. The Gap, Inc.*, 01-cv-0031 (D. N. Mar. I.), *Does I v. Advance Textile Corp.*, 99-cv-0002 (D. N. Mar. I.), *UNITE v. The Gap, Inc.*, 300474 (Cal. Super. Ct., San Francisco County). The settlement with several major U.S. clothing retailers, valued at \$20 million, includes a \$6.4 million in unpaid back wages for 30,000 former and current garment workers, a company code of conduct, independent monitoring, and a \$3,000 repatriation fund.

*Mambuki v. Securitas Security Services USA, Inc.* (\$15 million settlement)

*Dabingo v. Royal Caribbean* (\$18.4 million settlement)

*Adams v. Blockbuster* (\$12 million settlement)

*Butler v. Home Depot, Inc.* (\$65 million settlement)

Sex discrimination claims brought by female employees of Defendant's West Coast Division Stores.

*"20 Year Pension" Class Settlement* (\$160 million settlement)

Alleged miscalculation of retirement benefits for New York City teachers and Board of Education employees.

*Washington Mutual Bank/J.P. Morgan Chase Bank Wage and Hour Cases* (\$41 million settlement)

Alleged unpaid wages.

*Vedachalam v. Tata Consultancy Services* (\$29.75 million settlement)

This matter involved non-U.S. citizens deputed from India to the United States. Among other services, Gilardi provided a Hindi translation of the notice.

*Waste Management Wage and Hour Cases* (\$15 million settlement)

*USA Petroleum Wage Cases* (\$15 million settlement)

*Martin v. FedEx Ground Package Systems, Inc.* (\$8.1 million settlement)

*Savala v. Nordstrom* (\$12.5 million settlement)

*Madison v. Cedar Fair* (\$9 million settlement)

*Rutti v. LoJack Corporation* (\$8.1 million settlement)

Average settlement payment of \$21,000.

*Cookson v. NUMMI (New United Motor Manufacturing, Inc.) and Toyota* (\$6 million settlement)

*Trauth v. Spearmint Rhino Companies Worldwide* (\$12.97 million settlement)

Multi-state distribution.

*Mowdy v. Beneto Bulk Transport* (\$14 million settlement)

*Castellanos v. The Pepsi Bottling Group* (\$9 million settlement)

*Bolanos v. Norwegian Cruise* (\$25 million settlement)

*Pedroza v. PacBell* (\$4.5 million settlement)

*Erickson v. Old Republic* (\$12 million settlement)

*Ingersoll v. Farmland Foods* (\$4.25 million settlement)

## Securities and Exchange Commission Administrations

*SEC v. Cardinal Health* (\$35 million settlement)

*SEC v. Charles Schwab* (\$110 million settlement)

*SEC v. Qwest Communications* (\$252 million settlement)

*SEC v. Sayre et al.* (\$0.99 million settlement)

*SEC v. Skowron* (\$35 million settlement)

## Securities Litigation

*Enron Securities Litigation* (\$7.2 billion settlement)

Gilardi facilitated 12 Notice mailings prior to the claims administration process. Researched and identified 66 known eligible securities and hundreds of “other security types” under the sophisticated Plan of Allocation. Eligible securities comprised of common stock, bonds, foreign debt, employee options, listed options, convertible preferred notes.

*AOL Time Warner Securities Litigation* (\$2.5 billion settlement)

*Charles Schwab Corporation Securities Litigation (Federal Class and California Class)* (\$235 million combined settlement for civil case)

*Cardinal Health, Inc. Securities Litigation* (\$600 million settlement)

*Qwest Communications International Securities Litigation* (\$445 million settlement)

*Xerox Securities Litigation* (\$750 million settlement)

*UnitedHealth Group Securities Litigation* (\$925.5 million settlement)

Settlement involved eighteen unique security types comprised of common stock, bonds, listed options, and employee options.

*Deutsche Bank MBS Securities Litigation* (\$32.5 million settlement)

Settlement involved two trusts (Deutsche Alt-A Securities Mortgage Loan Trust 2006-AR5 & Deutsche Alt-B Securities Mortgage Loan Trust 2006-AB4) with a total of 52 tranches and multiple CUSIPs.

*Citigroup Mortgage Securities Litigation* (\$25 million settlement)

Settlement involved two trusts (Citigroup Mortgage Loan Trust 2007-AR5 & Citigroup Mortgage Loan Trust 2007-WFHE2) with a total of 38 tranches and multiple CUSIPs.

*Canadian Superior Securities Litigation* (\$5.2 million settlement.)

Administration was cross-border with multi-currency distribution in the United States and Canada.

*Flomserve Securities Litigation* (\$55 million settlement)

*Accredo Health Securities Litigation* (\$33 million settlement)

*Sonus Networks Securities Litigation* (\$40 million settlement)



*Touch America/Montana Power Litigation* (\$58.3 million settlement)

Integrated a Federal, State and ERISA action in one global Notice mailing, managed two separate plans of allocations within one claimant database and facilitated a joint distribution of monies.

*Shuffle Master, Inc. Securities Litigation* (\$13 million settlement)

## **U.S. Department of Justice Remission and Restitution**

**Gilardi currently holds a contract with the DOJ to provide redress and asset forfeiture administrative services. We were ranked #1 of all respondents to the DOJ's solicitation.**

*U.S. v. Kristine Eubanks* (\$1.8 million remission)

In addition to processing the petitions for remission, Gilardi's duties included verifying the petition entries against actual items received and cataloging and maintaining inventory records of submissions.

*U.S. v. Richard Alyn Waage* (\$8.6 million remission)

Gilardi inherited aged claimant data and supporting documentation from the IRS and former contractor, normalized information and converted into electronic format to facilitate notice and distribution.

*U.S. v. MoneyGram International* (\$100 million remission)

*U.S. v. Qwest Communications* (\$44 million remission)

*U.S. v. David A. Smith* (approximately \$5.2 million remission)

*U.S. v. ProNetLink* (\$7.7 million remission)

The DOJ "piggybacked" the claimant database established in the corresponding civil matter, utilizing a slightly different distribution plan.